

COOPER LEVENSON APRIL NIEDELMAN & WAGENHEIM, P.A.  
1125 ATLANTIC AVENUE  
ATLANTIC CITY, NJ 08401  
(609) 572-7512  
*Counsel for M.D. Sass Defendants*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

IN RE NEW JERSEY TAX SALES  
CERTIFICATES ANTITRUST LITIGATION

Master Docket

No. 3:12-CV-01893-MAS-TJB

**M.D. SASS DEFENDANTS'  
NOTICE OF MOTION TO  
DISMISS**

**ORAL ARGUMENT  
REQUESTED**

TO: LITE DEPALMA GREENBERG, LLC  
Bruce D. Greenberg  
Steven J. Greenfogel  
Two Gateway Center, Suite 1201  
Newark, New Jersey 07102-5003

*Interim Liaison Counsel*

HAGENS BERMAN SOBOL SHAPIRO LLP  
Steve W. Berman (admitted *pro hac vice*)  
1918 Eighth Avenue, Suite 3300  
Seattle, WA 98101

HAGENS BERMAN SOBOL SHAPIRO LLP  
Jason A. Zweig (admitted *pro hac vice*)  
One Penn Plaza, 36th Floor  
New York, NY 10119

HAGENS BERMAN SOBOL SHAPIRO LLP  
Jennifer F. Connolly (admitted *pro hac vice*)  
629 K Street, NW, Suite 300  
Washington, DC 20006

HAUSFELD LLP  
Michael D. Hausfeld (admitted *pro hac vice*)  
James Pizzirusso (admitted *pro hac vice*)  
Seth R. Gassman (admitted *pro hac vice*)  
1700 K Street, NW, Suite 650  
Washington, DC 20006

*Interim Class Counsel*

PLEASE TAKE NOTICE that on the Monday, June 3, 2013, or as soon thereafter as counsel can be heard, the undersigned counsel for the below-referenced defendants shall move before the Honorable Michael A. Shipp of the United States District Court for the District of New Jersey at 402 East State Street, Trenton, New Jersey 08608 for an Order dismissing the claims asserted against them in Plaintiffs' Consolidated Master Class Action Complaint, pursuant to Rule 12(b) of the Federal Rules of Civil Procedure.

PLEASE TAKE FURTHER NOTICE that, in support of this motion, defendants submit the accompanying Memorandum of Law and a proposed form of Order.

Dated: March 8, 2013  
Atlantic City, New Jersey

Respectfully Submitted,

COOPER LEVENSON APRIL  
NIEDELMAN & WAGENHEIM, P.A.

/s/ William J. Hughes, Jr. (WH-1924)  
William J. Hughes, Jr.  
1125 Atlantic Avenue  
Atlantic City, NJ 08401  
Tel: (609) 572-7512  
[WHUGHES@cooperlevenson.com](mailto:WHUGHES@cooperlevenson.com)

KRAMER LEVIN NAFTALIS &  
FRANKEL LLP

Eric A. Tirschwell (*pro hac vice*)  
Michael J. Dell (*pro hac vice* pending)  
Jennifer L. Rochon (*pro hac vice*)  
Jade A. Burns (*pro hac vice*)  
1177 Avenue of the Americas  
New York, NY 10036  
Tel: (212) 715-9100  
[etirschwell@kramerlevin.com](mailto:etirschwell@kramerlevin.com)

*Counsel for Defendants M.D. Sass  
Municipal Finance Partners I, L.P., M.D.  
Sass Municipal Finance Partners II, L.P.,  
M.D. Sass Municipal Finance Partners III,  
LLC, Municipal Finance Partners IV, LLC,  
M.D. Sass Municipal Finance Partners V,  
LLC, M.D. Sass Municipal Finance  
Partners VI, LLC, M.D. Sass Tax Lien  
Management LLC, and M.D. Sass Investor  
Services, Inc.*